

RIVIERE CRESCI & SINGER, LLC  
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Attorneys for Plaintiff

JEROME WHITE,

Plaintiff,

Vs.

FREEHOLD BOROUGH, FREEHOLD  
BOROUGH POLICE DEPARTMENT,  
POLICE OFFICER EDUARDO  
SANTANA, POLICE OFFICER HEALY,  
SERGEANT COLANER, POLICE CHIEF  
MITCH ROTH & OFFICERS DOES NO'S  
1-10,

Defendants.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

CASE NO: **3:11-CV-00722-MLC-TJB**

CIVIL ACTION

**NOTICE OF MOTION**

TO: ALL COUNSEL ON ATTACHED CERTIFICATION OF MAILING

PLEASE TAKE NOTICE that the undersigned Paul J. Riviere , attorney for the plaintiff, shall make application before the Honorable Tonianne J. Bongiovanni at the United States Court House, Trenton, New Jersey to Compel Discovery in the above captioned case whereby the plaintiff had brought the instant action, inter alia, to recover damages under 42 U.S.C. § 1983 related to his arrest by defendants who are police officers (dkt. entry no. 1, Compl.); and wherein the Defendants have failed to provide discovery essential to the Plaintiff's case. A date is to be set by the court but the Plaintiff is requesting July 15<sup>th</sup>, 2013, as the return date upon submission.

In support of its application the plaintiff will rely on the certification of Paul J. Riviere, Esq and the attached hereto.

By: /s/ Paul J. Riviere, Esq

June 13, 2013